



landscape architecture ■ urban design
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REVIEW OF LANDSCAPE AND VISUAL IMPACT ASSESSMENT

on behalf of

CHERWELL DISTRICT COUNCIL

in connection with

**Application reference: 25/01346/OUT - Part OS Parcel 0006 North Of, The Moors,
Kidlington**

September 2025

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1 INTRODUCTION

- 1.1 Huskisson Brown Associates (HBA) is a firm of Chartered Landscape Architects, established in 1987 and registered since then with the Landscape Institute. HBA has been a member of the Institute of Environmental Management and Assessment since 1992.
- 1.2 The practice has undertaken a range of landscape and visual assessment work and reviews for many clients including public bodies, private companies and individuals.
- 1.3 HBA has previously been retained by Cherwell District Council (CDC) to advise on landscape and visual matters in connection with a number of individual planning applications and planning appeals.
- 1.4 HBA was appointed by CDC in August 2025 to carry out a review of the Landscape and Visual Impact Assessment (LVIA) prepared by Cordle Design on behalf of the applicant, Harper Crewe Bloombridge Ltd, in relation to application **25/01346/OUT**.
- 1.5 The application is described as:
- “Outline planning application with all matters reserved (except means of access) for up to 340 dwellings (Use Class C3), land for local community use and pavilion, landscaping, public open space and associated infrastructure, including demolition of 162 The Moors to enable all modes access.”*
- 1.6 The review considers the LVIA in relation to current best practice, namely the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (April 2013 by the Landscape Institute and the Institute of Environmental Management and Assessment).
- 1.7 The review has been carried out in general accordance with the Landscape Institute’s Technical Guidance Note (TGN) 1/20 (published 10th January 2020).
- 1.8 TGN 1/20 gives guidance for reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs), identifying the three main components of a review as to the completeness, competency and reliability of an LVIA / LVA. These are stated as:
1. *Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;*
 2. *Checking the baseline, content and findings of the assessment; and*
 3. *Checking the presentation of the assessment findings.*
- 1.9 The above areas of review are reported and summarised in an overall conclusion, reporting the findings of the review. TGN 1/20 also notes that further information which is considered relevant to reporting on the compliance (or otherwise) of the LVIA/LVA with GLVIA3, or matters of competence or expertise may also be reported on in an LVIA/LVA Review. In this instance, the scope of the LVA Review also includes:
- Comments and observations on the proposed scheme that HBA consider would have a bearing on its landscape and visual appropriateness and / or “fit” within the landscape.
 - Comments on whether HBA agree with the LVA findings overall.
- 1.10 Where comments are made by HBA on the LVIA findings and judgements, these are based

upon professional judgement, review of the landscape and visual baseline, site inspection and the indicative development proposals. A separate LVIA has not been carried out by HBA.

- 1.11 TGN 1/20 notes that in some instances it may be appropriate to discuss issues arising with the author of the assessment under review. This was not allowed for at this stage although the applicant requested an inception meeting prior to the site visit preceding the review. This was held on site on 5th September. Mr S Roberts, Mr P Cordle and Mr R Grierson attended on behalf of the applicant. Mr D. Huskisson attended on behalf of CDC.
- 1.12 This LVIA Review has been prepared by a Chartered Member of the Landscape Institute with substantive experience of undertaking and reviewing LVIA's and LVAs and in working for CDC.
- 1.13 The core material that is relevant to this review is the following document:
- Landscape and Visual Impact Assessment by Cordle Design dated May 2025 including its associated Appendices.
- 1.14 Additionally, it is acknowledged that the application includes a '*Planning Statement*' and a '*Design and Access Statement*' (DAS) updated in September 2025 and other documents covering a range of related subject areas including Green Belt issues.
- 1.15 The application documentation was updated in early September as a result of early consultation feedback.
- 1.16 The principle change relates to the proposed treatment of the eastern end of the site. The original proposal, now termed Option 1, would have introduced two cricket pitches with a pavilion and parking area. Option 2 omits the cricket pitches and pavilion and incorporates a country park style of treatment together with some play facilities and an open scattering of tree planting.
- 1.17 No update to the LVIA was lodged at this time so it has been assumed that the landscape and visual effects of Option 2 have been considered to be broadly as for Option 1.
- 1.18 In addition to GLVIA3 and TGN 1/20 noted above, the following are also relevant:
- National Planning Policy Framework (NPPF), updated 12th December 2024;
 - Cherwell Local Plan 2011 – 2031 (Part 1), adopted 20th July 2025;
 - Cherwell Local Plan 1996 Saved Policies, adopted November 1996;.
 - Cherwell Local Plan Review 2040 Consultation Draft (Regulation 18) September 2023;
 - Cherwell Landscape Sensitivity Assessment Final Report, The Environment Partnership, September 2022;
 - Cherwell Green and Blue Infrastructure (GBI) Strategy Final Report, LUC, November 2022;
 - National Character Area (NCA) 108 'Upper Thames Clay Vales as defined by Natural England;
 - Oxfordshire Wildlife and Landscape Study;
 - Cherwell District Council, Countryside Design Summary SPD, June 1998;
 - Historic Landscape Characterisation;
 - Historic England website;
 - Historic Ordnance Survey and Google Map Aerial mapping;

- TGN 06/19 Visual Representation of Development Proposals. The Landscape Institute;
 - TGN 02-21 Assessing landscape value outside national designations. The Landscape Institute;
 - LITGN 01-24 Notes and Clarification on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3) Published August 2024. The Landscape Institute.
- 1.19 HBA are familiar with Kidlington and the wider area in relation to our other work for CDC. However, as noted above, a specific visit, including inspecting some of the viewpoints identified in the LVIA, has been undertaken to review the findings of the LVIA and provide comments on the judgements of landscape and visual effects. This was carried out on 5th September 2025, following the inception meeting, in conditions of good visibility. Broadleaved vegetation was still in full leaf, so visibility was at its most restrictive.
- 1.20 This report seeks to follow the main structure identified above at Paragraph 1.6 but inevitably there is significant overlap between the matters TGN 1/20 identifies for review. It is thus frequently the case that one particular point has implications on several parts of the review.

2 CHECKING THE METHODOLOGY USED TO UNDERTAKE THE ASSESSMENT, THE CRITERIA SELECTED (INCLUDING BALANCE BETWEEN), AND THE PROCESS FOLLOWED

2.1 TGN 1/20 advises that this phase involves reviewing the following:

- 1 *Does the scope of the assessment meet the requirements set out in the Scoping Opinion and/ or as defined in the LVIA or LVA and if substantively different, are the reasons clearly set out and explained?*
- 2 *What consultations have been carried out and have responses been acted upon?*
- 3 *Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?*
- 4 *As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements including thresholds been clearly defined and have any deviations from good practice guidance (such as GLVIA3) been clearly explained?*
- 5 *Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?*
- 6 *Does the assessment demonstrate comprehensive identification of receptors and of all likely effects? and*
- 7 *Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?*

Does the scope of the assessment meet the requirements set out in the Scoping Opinion and/ or as defined in the LVIA or LVA and if substantively different, are the reasons clearly set out and explained?

2.2 Scoping is not relevant in the context of the scheme which is not subject to EIA as explained in other documents. However, a general point can be made in that the LVIA refers to the significance of effects. In the reviewer's opinion this term should only be used where the LVIA is part of an EIA as the assessment of 'significance of effect' is not required where no EIA is involved (See GLVIA3 Table 3.1 and TGN 01/24).

2.3 From the inference given (LVIA 1.1) the reviewer has assumed that the scope of the LVIA was agreed with CDC at pre-consultation meetings although this is not explicitly stated, neither does the LVIA explicitly set out the scope.

What consultations have been carried out and have responses been acted upon?

2.4 There is reference to the LVIA Methodology and viewpoint locations having been discussed with CDC at pre-application meetings (LVIA 1.1) although no specific detail is provided. There is no statement as to the Study Area for the LVIA and no Study Area is shown on any LVIA figure.

2.5 From the inception meeting the reviewer understands that Cordle Design had been working on the scheme since about 2018 and had been involved in aspects of the consultations with CDC. It has therefore been assumed that the consultation responses in so far as they may have related to landscape and visual issues have been acted upon.

- 2.6 There is no reference in the LVIA to any other consultations being carried out.
Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?
- 2.7 The reviewer understands that the CDC landscape officer dealing with the pre-application consultations is no longer at the authority. No formal statement has been included in the LVIA saying that the Methodology etc was agreed but, for the purposes of this review, it has been taken to have been approved.
As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements including thresholds been clearly defined and have any deviations from good practice guidance (such as GLVIA3) been clearly explained?
- 2.8 The opening paragraphs of the Methodology and the LVIA both state that the methodology is drawn from GLVIA 3. This is the appropriate base document.
- 2.9 No mention is made of the TGNs detailed above in either the Methodology or LVIA. This suggests that the methodology has not been updated to reflect latest advice from the Landscape Institute, in particular that contained in LITGN 01-24 which should be read alongside GLVIA3.
- 2.10 As noted above, the Methodology refers to significant effects.
- 2.11 The LVIA methodology is set out in a supporting document at Appendix 5. Unfortunately, the Methodology contains no paragraph numbers or pagination which makes cross referencing difficult or, in the worst case it is unclear if the whole document has been reproduced.
- 2.12 There is a fairly limited range of tables / matrices / schedules in the Methodology to set out how the assessment is structured and the criteria applied. There is limited reference to the role professional judgement should play in the assessment process although it is acknowledged that it does play a part.
- 2.13 Many methodologies have a matrix to help explain the relationship between value and susceptibility and how they lead to judgements on sensitivity. This methodology does not.
- 2.14 The table /matrices/ schedules are essentially generic.
- 2.15 The Methodology contains a limited number of definitions and some of those that there are, appear to be slightly adapted from or truncated versions of those contained in GLVIA3. This is considered to fall short of good practice.
- 2.16 It is considered that the range of ranking/threshold criteria set out is broadly acceptable and in common usage, save as otherwise noted.
- 2.17 The LVIA has sections headed “Genius Loci / Sense of Place” yet there is nothing in the Methodology defining this or showing how it relates to the assessment or, if indeed, it is any different to the consideration of components of Landscape or Visual Character. Similarly, this term is not referenced in GLVIA3. It is considered that the introduction of this element has resulted in double counting. It is the reviewer’s opinion that Genius Loci should be covered by the consideration of landscape value under the various headings outlined in Table 2 of the methodology.

- 2.18 The LVIA considers Accessibility but does not distinguish how this is different to its consideration of Public Rights of Way. It is considered that this is another example of double counting. Accessibility would normally be considered in the Design and Access Statement.
- 2.19 The LVIA considers Landscape Amenity but this is not a matter referred to in the Methodology or GLVIA3 and is not defined in the LVIA.
- 2.20 It is considered that the inclusion of Genius Loci / Sense of Place, Accessibility and Landscape Amenity are matters that have been inadequately explained and justified in terms of how they are assessed and incorporated into the LVIA. It is the reviewer's opinion that they are misleading and inappropriate in an LVIA.
- 2.21 The Methodology contains no guidance on short term, medium term or long term landscape effects yet does provide this information in relation to visual effects.
- 2.22 It is noted that for visual effects the long term is stated as being 20 years in the Methodology but this conflicts with the Operation Year 15 noted in the Summary of Predicted Visual Effects on page 50 of the LVIA.
- 2.23 The methodology gives no guidance on what distances are considered to rank as short, medium or long distance views yet these terms are used in the LVIA.
- 2.24 The Methodology gives no guidance as to what growth rates for mitigation planting have been assumed.
- 2.25 Neither the methodology nor the LVIA give any information on possible phasing or advance planting, nor how the landscape infrastructure will be cared for. Clearly, in the event of permission being granted, conditions could cover some of these points, but it is not unreasonable on a development of this size, with its particular sensitivities, that these sorts of issues should have been given some consideration.
- 2.26 No deviations from GLVIA3 good practice have been recorded in the LVIA but, based on the points noted above, it is considered that there are some deviations from what would usually be provided in a robust methodology properly based on GLVIA3 and the latest guidance.

Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?

- 2.27 There is a reasonable demonstration that the issues are understood. The Methodology and LVIA separate out landscape and visual issues.

Does the assessment demonstrate comprehensive identification of receptors and of all likely effects?

- 2.28 The general identification of landscape receptors is largely satisfactory despite there being no stated Study Area limit for landscape components and, as noted above, some double counting of components.
- 2.29 In its consideration of Genius Loci (LVIA7.7) it is noted that the Thrupp Community Woodland and St Mary's Fields (Nature Reserve) are two discrete landscape units, yet these have not been identified on a plan or separated out for assessment. This appears to be at odds with how other components have been treated and is inconsistent.

- 2.30 The visual envelope mapping is indecipherable at the scale shown and as noted below it is considered that some receptors have been omitted.
- 2.31 Visual receptor identification fails to consider the occupiers of the adjacent residential properties that flank the southern side of the site. LITGN 01-24 6(1) notes that “*GLVIA3 is clear that people living in the area of the proposed development have to be considered as receptors (paragraph 6.13) and that views from settlements should be considered (paragraph 6.20). An LVIA should consider views from local communities focusing on the way that a community currently experiences views from public locations such as streets and open spaces and how those will change*”.
- 2.32 In this regard it is particularly noted that changes to The Moors from the various access proposals has not been considered in the LVIA. Given that the means of access is for determination at this stage, this omission is surprising.
- 2.33 It is considered that visitors to the churchyard of St Mary the Virgin, St Mary’s Fields Nature Reserve and Thrupp Community Woodland would have been better dealt with by being treated separately rather than mopped up in general commentary.
- Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?*
- 2.34 Figure 1 in the Methodology shows how Sensitivity and Magnitude criteria are combined to determine the likely significance of the predicted effects. This is a common type of matrix table which helps explain how impacts feed into the final assessment. However, the Sensitivity heading is wrong in that it is shown as “*Sensitivity (Value of Resource)*”. As set out subsequently on page 2 and page 4 of the Methodology, the value of a landscape resource combined with its susceptibility give the ranking of Sensitivity. The Table heading is therefore inaccurate and misleading.
- 2.35 Figure 1 in the methodology also contains another error. Magnitude of change shows rankings of Severe, Major, Moderate, Minor, Negligible and None yet Table 4 in the Methodology, which gives the definitions of magnitude of change, contains no ranking of Severe, the highest ranking being Major.
- 2.36 The Methodology and LVIA (1.7) both make it clear that for both landscape and visual receptors, sensitivity is derived from a consideration of the landscape or visual value with its susceptibility. Unfortunately, the LVIA does not do this, setting out its findings on Sensitivity with no reference to either value or susceptibility for both landscape and visual receptors. The assessment therefore does not follow the stated Methodology and the sensitivity rankings are thus considered to be unsubstantiated.
- 2.37 The landscape baseline does not cover the Church of St Mary the Virgin and Churchyard, identified at LVIA4.3 as a key landscape element “*that contributes to the distinctive landscape quality of the locale at The Moors ...*” yet it is included in in the assessment at LVIA 7.38.
- 2.38 The landscape baseline does not record the sensitivity of the Church Street Conservation Area. This is shown as high by reference to the assessment section.

- 2.39 Given that St Mary the Virgin Church and the Churchyard fall within the Church Street Conservation Area, it is considered that there is again an element of double counting.
- 2.40 Given this failure to follow the stated methodology, the conclusions on both landscape and visual sensitivities must be open to a degree of doubt.
- 2.41 Both the landscape and visual assessment sections of the LVIA highlight the sensitivity and the magnitude of change but fail to record the final stage of the assessment: the predicted effect. This is only shown for landscape effects in Appendix 2 whereas for visual effects, there is a Summary of Predicted Visual Effects on page 50 of LVIA. There is also inconsistency in recording whether the magnitude of change is claimed to be adverse or beneficial.
- 2.42 Furthermore, the Summary of Predicted Visual Effects notes whether effects on views are considered to be adverse or beneficial. The Summary Table of Visual Impacts set out in Appendix 1 does not, an unhelpful inconsistency
- 2.43 It is considered that the assessment does not adequately demonstrate either clarity or transparency in its reasoning. This observation is based on the lack of transparency in how sensitivity has been evaluated as noted above, for the double counting of various elements and for the general tone of commentary that, to the reviewer, appears to lack the impartiality necessary for a balanced assessment.
- 2.44 As made clear in TGN- 2024-01 2(.3) given that the scheme is in outline other than for the means of access, it would be expected that the assessment would be based on a cautious 'worst case' approach. There is no evidence that this approach has been adopted.

3 CHECK THE BASELINE CONTENT, AND FINDINGS OF THE ASSESSMENT

3.1 TGN 1/20 advises that this phase should involve the following:

- 1 *What is the reviewer's opinion of the scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the assessment of effects (supported by appropriate graphic such as ZTVs etc as appropriate)?*
- 2 *Has the value of landscape and visual resources been appropriately addressed (including but not necessarily limited to) considerations of: local, regional and national designations; rarity, tranquillity, wild-land and valued landscape?*
- 3 *Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change been clearly and objectively defined, avoiding scales which may distort reported results?*
- 4 *How well is the cross-over with other topics, such as heritage or ecology, addressed?*
- 5 *Is there evidence of an iterative assessment-design process?*
- 6 *Is it clear how the methodology was applied in the assessment, e.g.: consistent process, use of terms, clarity in reaching judgements and transparency of decision-making?*
- 7 *How appropriate are the viewpoints that have been used?*
- 8 *How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?*
- 9 *What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach to judging the significance of the effects identified, in the case of EIA projects?*
- 10 *What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration, etc.?*
- 11 *Does the document clearly identify landscape and visual effects which need to be considered in the assessment? and*
- 12 *Have levels of effect have been clearly defined and, in the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?*

What is the reviewer's opinion of the scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the assessment of effects (supported by appropriate graphic such as ZTVs etc as appropriate)?

- #### 3.2
- The overall scope of the assessment is considered to be poorly explained. There is no defined Study Area and the mapping used throughout the LVIA is very poor, being too small a scale to read or to clearly understand the site's relationship with its surroundings. Features on the figures are at best difficult to discern or at worst impossible to read. Most figures do not have a key and there is no cross referencing to figure numbers in the text. These are basic features that are expected to be present to help make an LVIA easily followed by the reader. The visual envelope map is particularly poor. This overall aspect of the LVIA is considered to be well

below what should be expected in a document which is trying to explain the issues at hand. (This general point about legibility was raised at the inception meeting. It was suggested that some quality issues might be related to the resolution of images on the CDC portal. Even if this is the case, members of the public would experience the same difficulties as noted by the reviewer.)

- 3.3 There is a lack of clarity of over how and when the site is being referred to, and too frequently it is lost in the general reference to The Moors landscape which itself is not clearly identified on any plan or clearly described. At LVIA 4.47, the Moors is referred to as a Landscape Character Area {LCA}. This blurring of descriptions is unhelpful and potentially misleading.

Has the value of landscape and visual resources been appropriately addressed (including but not necessarily limited to) considerations of: local, regional and national designations; rarity, tranquillity, wild-land and valued landscape?

- 3.4 The value of both the landscape and visual resources has not been addressed in the baseline study as noted above.

- 3.5 Reference has been made to the appropriate regional / local studies relating to landscape character.

- 3.6 Thrupp Community Woodland and St Mary's Fields Nature Reserve should have been noted as landscape resources.

Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change been clearly and objectively defined, avoiding scales which may distort reported results?

- 3.7 It is considered that the Methodology adequately addresses the above but the LVIA does not apply the stated methodology.

- 3.8 An error has been noted between Figure 1 and Table 4 in the methodology.

How well is the cross-over with other topics, such as heritage or ecology, addressed?

- 3.9 There is no cross over / reference to other specialist reports prepared to accompany the planning application other than in relation to the Green Belt. Some specific cross referencing to salient points in the Heritage, Ecology and Arboricultural Assessments would have been expected.

Is there evidence of an iterative assessment-design process?

- 3.10 No, the LVIA does not record this. However, the reviewer understands that the assessor was part of the team during the evolution of the proposal so this is an unfortunate omission from the LVIA.

Is it clear how the methodology was applied in the assessment, e.g. consistent process, use of terms, clarity in reaching judgements and transparency of decision-making?

- 3.11 As noted above, certain important parts of the methodology have not been applied. This inevitably leads to a lack of clarity in how the judgements have been made. Furthermore, the methodology lacks some information as to timescales and growth rates which need to be understood in order to properly evaluate the findings.

3.12 These sorts of omissions / inconsistencies tend to erode confidence in the assessment and it is not possible to follow the assessment process though.

How appropriate are the viewpoints that have been used?

3.13 There is a lack of clarity in how the viewpoints have been presented in that many of them are not from Public Rights of Way (PRoW) but from informal paths. Furthermore, in the baseline section of the LVIA, a section entitled Visual Perambulation shows photographs that are not used for the assessment nor recorded on a plan and surprisingly shows no view featuring the prominent spire of St Mary the Virgin.

3.14 The LVIA (5.77) notes that the assessment views are representative views. The reviewer considers it surprising that, given the overarching prominence of the spire of St Mary the Virgin over much of the site and its surroundings, no key views of this were identified. Having said that, the representative views that have been used that are from PRoWs are not inappropriate, save as noted below.

3.15 There are no views from the local road network, including The Moors which will have three new access points formed, and only one longer distance view is included.

3.16 There is no assessment view in the LVIA looking west from the churchyard of St Mary the Virgin although a view is reproduced from the 2009 Conservation Area Appraisal (Figure 12). The commentary provided at LVIA 4.53 implies a poorly cared for churchyard, cluttered by paraphernalia. This is considered to be a very dismissive and misleading description.

3.17 The reviewer visited all LVIA viewpoints other than VR 17. The mapping made it difficult to determine the location of this viewpoint and the information provided on VR 17 does not give an exact location. When discussing VR 17, the LVIA (8.45) notes that views are possible from PRoW 237/1/10 and 237/4/30 although Figure 8 in the LVIA, which shows PRoWs, does not extend far enough to show the latter route.

3.18 The reviewer noted the potential for several longer distance views over the site from the higher ground south of Bletchingdon that may equate to the family of views noted in the LVIA (8.45) but the LVIA mapping is inadequate to be definitive.

3.19 From the above it is considered that the viewpoints are only partly appropriate, those from the Moors and the churchyard of St Mary the Virgin being notable omissions.

3.20 The mapping of the viewpoints and PRoW is inadequate.

How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?

3.21 The proposed main structural landscape mitigation measures have been designed into the scheme and are recorded by parameter plans.

3.22 In addition to reinforcing the extant, mainly shrubby, planting to the northern open countryside boundary, development would be set back from the eastern boundary in an attempt to minimise effects on the setting of the listed St Mary the Virgin Church, its churchyard and the Church Street Conservation Area.

- 3.23 Additionally, the proposed mitigation strategy seeks to maintain some axial glimpsed views through the site to the prominent spire of St Marys.
- 3.24 In the reviewer's opinion not enough detailed justification is given for the frequent assertions that the mitigation strategy to the northern boundary would be effective in "occluding" the development from the views and landscape to the north, or the time taken to achieve "occlusion". As noted above, the planting along the northern boundary appears to be mainly shrubby growth with few if any trees. Advance planting of trees might be an appropriate treatment in the event that permission is granted. It would have been helpful if the LVIA had included a "typical illustrative detail" of a planting plan for a section of this important boundary that could have served as a yardstick for CDC in the event that permission is granted. Such a plan could also have given some support to the assertions made in the LVIA about the potential effectiveness of this part of the mitigation. Information in the Design and Assess Statement is too loose to satisfy this point.
- 3.25 The Land Use and Access parameter plan gives no minimum width to the important northern buffer strip that includes the existing planting. The Building Heights parameter plan gives proposed ridge heights of development areas of 9.0 and 14.0m but these heights exclude flues and chimneys. Of more concern however is the caveat that states that "all areas are subject to a horizontal tolerance of +/- 5m and vertical tolerance of +/- 2m.
- 3.26 It is a concern of the reviewer that an incursion of 5m northwards would significantly erode the space for appropriate screen planting. Adopting a precautionary / cautious approach, the assessment should have been prudently based on building heights of 11m and 16m. The LVIA is silent on these issues and raises no concern over the possible looseness of the parameter plan.
- 3.27 The LVIA (8.35) states, for example with regard to VR 12 that *"the landscape buffer will mature over time and this will have a beneficial effect on both the landscape and visual aesthetic"*. Given that very little of existing development is visible in this view, the claims of beneficial effects are, in the reviewer's opinion, hard to justify. There are numerous similar examples where simply too much optimism is built into the assessment of an outline scheme with seemingly scant regard for caveats noted on the parameter plans and the unknown detailed form of the mitigation measures.
- 3.28 The Option 1 treatment of cricket pitches is claimed to be an appropriate in character response to mitigate impact on St Marys yet the LVIA notes the tranquillity of the area at present which would be eroded to some degree by the proposed change of use. In the reviewer's opinion the LVIA's conclusion at 7.45 that the proposal to *"relocate the cricket ground adjacent to the church brings beneficial landscape effects"* is not substantiated. Neither is the statement at LVIA 7.41 that *"the amenities and the improved tranquillity that the proposals will bring to the western boundary of the Conservation Area..."* are improvements to the setting as the LVIA asserts. Indeed, the LVIA contradicts itself on the tranquillity point.

What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach

to judging the significance of the effects identified, in the case of EIA projects?

- 3.29 There is a concern as to the consistency and objectivity in the assessment of the sensitivity of receptors, if only because of the absence of explicit discussion and evaluation of value and susceptibility throughout the assessment.
- 3.30 Added to this, the LVIA adopts an overly pessimistic slant to recording the existing attributes of the site and an overly optimistic expectation of the eventual outcome.
- 3.31 However, with one notable exception, the magnitude of change identified at Day One is considered to be broadly / usually of the right order. The exception however is in the reviewer's opinion a very significant one in that the LVIA records only a "minor" magnitude of change on the overall landscape character of the site. The LVIA text (7.2-7.5) that seeks to justify this seems to focus predominantly on off site landscape and visual issues. The reviewer is of the opinion that the magnitude of change to the overall landscape character of the site can only credibly be regarded as Moderate (and probably on the cusp of Major), by reference to the definition in Table 4 of the methodology.

What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration, etc.?

- 3.32 There is virtually no information of these aspects in the LVIA. The development is very briefly outlined in Section 6 of the LVIA and the parameter plans and masterplan are reproduced but not in a legible form. It is acknowledged that the development is permanent. Reference has already been made to the lack of information about any possible phasing, advance planting and ongoing landscape management responsibilities /mechanisms.

Does the document clearly identify landscape and visual effects which need to be considered in the assessment?

- 3.33 It is considered that the range of effects identified is broadly adequate.
- 3.34 It is however considered that the LVIA is rather dismissive of the effects on landscape character, seemingly justifying this by reference to the fact that the site lies wholly within a very small outlier of the Rolling Farmland LCT identified in the Oxfordshire Wildlife Study (OWLS) (See LVIA4.13 and 7.13-7.15.) The LVIA's consideration of this is that "*the proposed development represents a pragmatic and sensible response to development pressures locally, using an outlying fragment of a least valuable and less attractive character type.*"
- 3.35 Paragraph 8 and 9 of the executive summary are especially damning of the landscape character and, in the reviewer's opinion, are substantially biased / unbalanced.
- 3.36 Given the area's small size, the reviewer considers that the area does indeed display several of the key characteristics of this character type, including prominent rolling landform, large geometric arable fields enclosed by a weak hedgerow pattern and thinly distributed hedgerow trees.
- 3.37 The landscape role the site plays in providing a setting for the settlement and in containing the existing settlement from the northern area of open countryside and the River Meadowlands is not discussed in the LVIA.

- 3.38 It is noted that no consideration has been given to effects on landform. Clearly there will be widespread regulation of levels required to achieve development platforms and road layouts. This is not unusual. However, in this instance, it is understood that Option 1 would require excavation to create part of the cricket pitch. On Option 2, some mounding is shown for play features. Whilst in both options, these effects would be localised, they occur in an area of acknowledged heightened sensitivity with a gently rising landform so perhaps some mention would have been merited.
- 3.39 Similarly, night time effect of lighting is not addressed. It could be quite an issue given the extensive accessways proposed and the Long Way sited on or near the ridge top. This is a surprising omission. Some statement as to the form of lighting could have been helpfully included in the LVIA. It is acknowledged that lighting would be conditioned, should planning permission be granted.
- 3.40 Other issues are adequately covered, albeit the findings are not always agreed with, other than for residents affected by the access proposals, receptors at St Marys churchyard, St Mary's Fields Nature Reserve and in Thrupp Community Woodland.

Have levels of effect have been clearly defined and, in the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?

- 3.41 It is considered that the LVIA is adequate in regard to these aspects, setting aside the errors in Table 1. There is no mention of Cumulative Effects but the reviewer is unaware of any adjacent application which might give rise to any.

4 CRITIQUE OF THE PRESENTATION OF THE FINDINGS OF THE ASSESSMENT

4.1 TGN 1/20 advises that this phase involves examining the 'presentation' of the assessment including report text, figures/ illustrations, visualisations, and other graphic material forming the LVIA or LVA, and answering the following:

- 1 *Does the LVIA/ LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the assessment of landscape and visual effects, including cumulative effects?*
- 2 *Have the findings of the assessment been clearly set out and are they readily understood?*
- 3 *Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?*
- 4 *Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?*
- 5 *Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards? and*
- 6 *Is there a clear and concise summation of the effects of the proposals?*

Does the LVIA/ LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the assessment of landscape and visual effects, including cumulative effects?

4.2 The LVIA displays a lack of transparency and its objectivity can be queried. An example of its lack of objectivity is noted in LVIA 9.3 where it is stated *"mitigation in design has led to a design layout via an iterative process, and it is the best possible design solution for the site"*. Again, at LVIA 9.9 it is claimed that *"overall, the set of proposals achieved through mitigation in design offer the best possible design solution for the proposed development of this part of the Moors landscape"*. In the reviewer's opinion this type of reporting noted in several instances suggests a lack of objectivity and balance.

4.3 The clarity of thinking is inevitably impacted by the LVIA not following the methodology with respect to the evaluation of landscape and visual sensitivities and lack of clarity when the development site is being referenced as opposed to the essentially undefined wider Moors Landscape.

4.4 The findings are set out in tables and summaries. However there are discrepancies between tables as noted above and the tables themselves could have been usefully more fully annotated to give greater clarity. (i.e. time scales, assumed growth of planting, winter views /summer views etc.

4.5 There is uncertainty over timescales with none given for landscape issues and differing ones given for residual visual effects.

4.6 There is a visual effects summary in the LVIA text but no landscape effects summary, which is contained in Appendix 2.

4.7 The predicted effects are not given as the text proceeds but only in the summaries.

- 4.8 Figure and Table numbers should have been cross referenced in the text.
- 4.9 The figures / mapping are poor, as noted above.
- Have the findings of the assessment been clearly set out and are they readily understood?*
- 4.10 The findings are set out and can be readily understood albeit they are considered to be unduly optimistic and are often rather dressed up with irrelevant information justifying the scheme in a way that is out of place in an impartial consideration of the likely effects.
- Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?*
- 4.11 There is a degree of communication between the text and tables. The illustrations only relate to baseline issues and these are hard to read, of a poor scale and, as noted in the PRoW figure, lacking coverage.
- 4.12 The graphics, such as there are, are poor and too much reliance has been placed on images captured from the web as opposed to original project specific mapping. Out of the mapping figures, only Figure 1 has a scale bar and none have a north point.
- 4.13 The quality of the viewpoint photography appears satisfactory with winter and summer views shown, but no detail is provided on exact locations, height of viewpoint, camera format, viewing distance etc, in accordance with TGN 06/19. The LVIA (5.1) states the photographic work is “in line with carefully specified guidance...” but does not say what the guidance is.
- 4.14 No visualisations of the proposals were prepared to support the findings of the LVIA. It is assumed that none were specifically requested by CDC. As noted below, the photographs are marked up to show the spread of development. The Design and Access Statement contains some aerial and streetscape interpretations.
- Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?*
- 4.15 For those viewpoints points covered, the photographs are considered to adequately record the nature of the receiving landscape. The assessment photographs are annotated to indicate the extent of built form and open land which is helpful.
- 4.16 A view from the Churchyard and from the vicinities of the access points on The Moors would have been expected.
- Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards?*
- 4.17 In the reviewer’s opinion the map graphics are barely fit for purpose.
- 4.18 As noted above, it is not known if the assessment photography is compliant with guidance and no visualisations were incorporated into the LVIA.
- Is there a clear and concise summation of the effects of the proposals?*
- 4.19 The LVIA contains an Executive Summary. Whilst this covers the main landscape and visual issues it strays into other asserted benefits such as accessibility, wider recreational and amenity gain and gains in biodiversity. It is questioned if this is appropriate in an LVIA, the reviewer being of the opinion that it masks the clear reporting of the core landscape and visual issues.

- 4.20 The overall tenor of the executive summary is considered to be unbalanced and over optimistic.

5 OVERALL CONCLUSION: REPORT THE REVIEW

5.1 TGN 1/20 advises that this final step of the review process is to use the reviewer's findings to produce a short report which should include (but need not be limited to):

- 1 *Confirmation of the brief issued to the reviewer setting out the scope of the review;*
- 2 *A summary of how the review was undertaken;*
- 3 *A summary of findings of the review of the assessment methodology;*
- 4 *A summary of findings of the review of the scope of the assessment;*
- 5 *A summary of findings of the review of the actual assessment of effects;*
- 6 *A summary of findings of the presentation of the assessment;*
- 7 *A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations;*
- 8 *Recommendations for further information to be sought (if necessary); and*
- 9 *Overall conclusions on the adequacy of the assessment and whether it is sufficient to support making an informed planning decision.*

Confirmation of the brief issued to the reviewer setting out the scope of the review;

5.2 The scope of this review was to undertake a review of the submitted Landscape and Visual Impact Assessment (LVIA) in general accordance with the Landscape Institute's Technical Guidance Note (TGN) 1/20 (10 Jan 2020). This gives guidance for reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs). It identifies the three main components of a review as to the completeness, competency, and reliability of an LVIA / LVA. These are stated as:

1. *Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;*
2. *Checking the baseline, content and findings of the assessment; and*
3. *Checking the presentation of the assessment findings.*

5.3 The review was undertaken by a Chartered Member of the Landscape Institute experienced in the preparation and review of LVIA's and LVA's.

A summary of how the review was undertaken;

5.4 The work involved both desk-based review and a site visit. The desk-based work centred on reading the LVIA, following through the methodology by means of both the text and tables and spot checking a range of the other documents referred to.

5.5 The Design and Access Statement and its addendum covering Option 2 were also briefly reviewed as was information on the Green Belt.

5.6 The site work involved walking the boundaries of the site, the local Public Rights of Way and roads both in the vicinity of the site and further afield. This was to check the existing character of the site and its environs and to confirm that the viewpoints were representative and that the LVA descriptions of the form and character of the site were appropriate.

5.7 In addition to the above, at the applicant's request, an inception meeting was held prior to

the site visit.

- 5.8 The site visit was carried out in fine weather with good visibility and full foliage cover.
- A summary of findings of the review of the assessment methodology;*
- 5.9 It has been assumed that the methodology adopted was approved by CDC as it was covered at a pre-application meeting. However, no specific confirmation of this has been seen.
- 5.10 The LVIA methodology is generic and only loosely compliant with GLVIA3 guidance. Its clauses are unnumbered and it is not paginated which makes cross referencing difficult and it is not clear if any pages are missing.
- 5.11 The methodology is light on definitions and those that there are differ to some degree from those given in GLVIA3.
- 5.12 There is no reference in the methodology to any TGNs that have been issued by the Landscape Institute since publication of GLVIA3 to clarify current best practice in preparing LVIA's. This is a concern.
- 5.13 There is no reference in the methodology to Genius Loci / Sense of Place, Accessibility, or Landscape Amenity, yet these considerations feature as separate entities in both the baseline recording and the assessment. These elements are essentially double counted as the reviewer would expect them to be considered under the standard headings as part of the normal evaluation of landscape and visual values or dealt with in the Design and Access Statement.
- 5.14 Tranquillity which, in accordance with GLVIA3 and this methodology (See Table 2 Criteria for Assessing the Value of Non-designated Landscape Attributes) feeds into value, is also treated separately. This again represents double counting.
- 5.15 The above issues create confusion between the methodology and the assessment. The LVIA offers no justification for their separate recording and assessment. The reviewer considers these issues represent a notable departure from GLVIA3 guidance.
- 5.16 The methodology does not differentiate between EIA or other work.
- 5.17 The methodology gives guidance on timescales of effect for visual issues but not for landscape issues. This is an omission of note.
- 5.18 The methodology gives no guidance on assumed planting growth rates which is helpful when judging mitigation over time.
- 5.19 The methodology gives no guidance on the consideration of construction effects.
- 5.20 The methodology gives no guidance on the assumed timing of the Day One effects, often given as a winter view, with the assessment at Year 15 or 20 being a summer view.
- 5.21 The methodology deals with the range of factors that can inform landscape value in GLVIA3 Box 5.1 (or the subsequent TGN 02-21) but does not deal with the function of the landscape, neither is there an clear evaluation of value.
- 5.22 There is recognition of the role that should be played by professional judgement.
- 5.23 In the reviewer's opinion, a core finding of the LVIA that the site would only experience minor

landscape change rings an alarm bell as to the balance of the assessment. This, taken together with the lack of any consideration of landscape and visual receptor values and their susceptibilities are concerning features that seriously undermine the LVIA.

A summary of findings of the review of the scope of the assessment;

5.24 Despite the lack of a defined Study Area, the scope of the LVIA is considered to be broadly appropriate in terms of the range of issues identified and the geographic extent, save for the omission of any consideration of the effects arising from the specific access proposals, on visitors to the churchyard of St Mary's, St Mary's Fields Nature Reserve and the Thrupp Community Woodland.

5.25 Night time lighting and landform effects are considered to have merited some recognition yet the LVIA is silent on these.

A summary of findings of the review of the actual assessment of effects;

5.26 The findings are reasonably clearly set out in relation to both landscape and visual issues. However, the findings themselves are not considered always reasonable / reliable.

5.27 Given the outline nature of the proposal, with only access to be determined at this stage, it is considered that a more precautionary/ cautious approach should have been adopted with regard to the assessment of potential effects, particularly the residual effects.

5.28 The LVIA is not considered to be a well balanced and objective assessment on which CDC should rely in its decision making.

A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations;

5.29 The main concerns relate to objectivity and balance, compliance with the stated methodology, unexplained double counting and lack of acknowledgement of any TGNs. Other factors identified in the review include the quality of the mapping and lack of cross referencing with the LVIA and to other relevant studies, any critique /discussion of the parameter plans and the lack of assessment of the accesses.

5.30 Taken in the round, the reviewer considers that the LVIA falls short of the standard GLVIA3 seeks to achieve.

Recommendations for further information to be sought (if necessary);

5.31 The following items are in no particular order

- Establish minimum width for planting belt to northern boundary together with illustrative planting details and specification.
- Seek to tighten up tolerances on the built form parameter plan.
- Prove by a series of cross sections the effectiveness of the northern planting screen from both low and high viewpoints to the north and north east showing the worst case development heights.
- Provide some guidance on lighting, especially with regard to perimeter access ways / footpaths.

- Clarify extent of landform alterations in western end of site and confirm that no land raising is proposed along the northern boundary.
- Provide an outline Landscape and Ecological Management Plan that would form the basis for a fully detailed management plan in the event permission is granted, together with details of how the management would be funded over time.
- No review of Option 2 was provided. It is the reviewer's opinion that, should the application be granted planning permission, Option 2 would be strongly preferred for both landscape and visual reasons, not the least of which would be minimising hedgerow loss and reducing landform effects. To this end some further illustrative material for Option 2 would be helpful.

Overall conclusions on the adequacy of the assessment and whether it is sufficient to support making an informed planning decision

- 5.32 The reviewer considers that the LVIA is inadequate and is not suitable to support making an informed planning decision.